

MELLINGER KARTZMAN LLC

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Attorneys for Trustee, Steven P. Kartzman

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In Re:

**MICHAEL KALFUS AND ROBIN
KALFUS,**

Debtors.

CASE NO: 18-13396 (VFP)

Chapter 7

Honorable Vincent F. Papalia

**NOTICE OF MOTION TO DISALLOW,
MODIFY AND FIX TREATMENT OF
CLAIMS PURSUANT TO FED. R.
BANKR. P. 3007 AND 11 U.S.C. § 502
(CLAIM NO. 19)**

Hearing Date: 3/29/2022 @ 10:00 am

Oral argument waived unless opposition
filed.

TO: Office of the United States Trustee
One Newark Center, Suite 2100
Newark, New Jersey 07102

Shellpoint Mortgage Servicing
PO Box 10826
Greenville, South Carolina 29603-0826

PLEASE TAKE NOTICE that on March 29, 2022 at 10:00 a.m. in the forenoon or as soon thereafter as counsel may be heard, the undersigned, attorneys for Trustee, Steven P. Kartzman, shall apply before the United States Bankruptcy Court, the Honorable Vincent F.

Papalia presiding, for the entry of an Order to Disallow, Modify and Fix Treatment of Claims Pursuant to FED. R. BANKR. P. 3007 and 11 U.S.C. § 502 (Claim No. 19).

Your claim may be reduced, modified, disallowed or treatment may be fixed. You should read these papers carefully and discuss them with your attorney, if you have one.

If you do not want the Court to disallow, modify or fix treatment of your claim, then on or before March 22, 2022, you or your attorney must file with the Court a written response to the objection, explaining your position, at:

Clerk, United States Bankruptcy Court, District of New Jersey
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, New Jersey 07102

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

Mellinger Kartzman LLC
Attn.: Steven A. Jayson, Esq.
101 Gibraltar Drive, Suite 2F
Morris Plains, New Jersey 07950
Attorneys for the Trustee

and

Office of the United States Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

You also must attend the hearing at the time and date set forth above, before the Honorable Vincent F. Papalia, at the United States Bankruptcy Court, 50 Walnut Street, Newark,

New Jersey 07102. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought by the Trustee.

If no party timely files and serves opposition to the Motion, the Court may decide the Motion on the papers without a hearing pursuant to N.J. LBR 9013-1(f). A Statement as to why No Brief is Necessary and proposed form of Order are also being submitted herewith. Oral argument is hereby waived (unless opposition is filed).

In support of this motion, the Trustee shall rely on the Certification of Steven P. Kartzman filed herewith, and the arguments of counsel, if any.

MELLINGER KARTZMAN LLC
Attorneys for the Trustee

Dated: February 22, 2022

By: Steven A. Jayson
STEVEN A. JAYSON, ESQ.

STATEMENT AS TO WHY NO BRIEF IS NECESSARY

In this Motion, the Trustee seeks an Order disallowing, modifying and fixing the treatment of claims pursuant to 11 U.S.C. § 502 and FED. R. BANKR. P. 3007. The sole issue before the Court is whether there are grounds for such relief. The law is well settled, and therefore no brief is required.

Respectfully submitted,

MELLINGER KARTZMAN LLC
Attorneys for the Trustee

Dated: February 22, 2022

By: Steven A. Jayson
STEVEN A. JAYSON, ESQ.